

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, JOHN DOES 1 through 5,
JANE DOES 1 through 5,

Defendants.

Civil Action
No. 04-10535 PBS

**SHAREHOLDER.COM'S UNOPPOSED MOTION TO EXTEND THE TIME TO
ALLOW ROBERT ADLER TO RESPOND TO SHAREHOLDER.COM'S
MOTION FOR LEAVE TO AMEND THE COMPLAINT**

Shareholder.com respectfully requests that the Court grant Robert Adler until March 28, 2005 to respond to Shareholder.com's Motion for Leave to Amend the Complaint filed on February 15, 2005. Counsel for Mr. Adler has indicated that this will give him sufficient time to file a response, and the defendants do not oppose the relief requested in this motion. In support of this motion, Shareholder.com states as follows:

(1) Mr. Adler and the defendants submit that Local Rule 15.1(B) required Shareholder.com to serve Mr. Adler with a copy of its Motion for Leave to Amend the Complaint ten days before filing the motion.

(2) Immediately upon being informed of this objection to its motion, Shareholder.com served Mr. Adler's counsel with a copy of the motion and accompanying documents. Mr. Adler's counsel received these documents on February 28, 2005.

(3) To avoid unnecessary motion practice and undue delay, Mr. Adler agreed not to seek withdrawal of the motion if he were permitted sufficient time to respond to Shareholder.com's Motion for Leave to Amend the Complaint.

(4) Having served Mr. Adler with its motion on February 28, 2004, Local Rule 15.1(B) contemplates that Shareholder.com would file its motion on March 14, 2005. Mr. Adler would then be allowed to file a response by March 28, 2005.

(5) Shareholder.com and Mr. Adler agree that giving Mr. Adler until March 28, 2005 to respond to Shareholder.com's motion is a fair resolution of this matter.

(6) The defendants do not oppose the relief requested in this motion.

Accordingly, Shareholder.com respectfully requests that the Court grant Mr. Adler until March 28, 2005 to respond to its Motion for Leave to Amend the Complaint.

Respectfully submitted,

/s/ Ruth T. Dowling

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March 3, 2005

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party and counsel for Robert Adler by hand on March 3, 2005.

/s/ Ruth T. Dowling

LOCAL RULE 7.1 CERTIFICATE

Counsel for Shareholder.com certifies that they conferred with Counsel for Mr. Adler and counsel for defendants as indicated in the motion.

_____/s/ Ruth T.Dowling_____